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18 Attorneys for Defendant
17 CONTRA COSTA COUNTY

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

21 | RETIREE SUPPORT GROUP OF CONTRA
COSTA COUNTY,

Plaintiff.

V.

24 CONTRA COSTA COUNTY,
25 Defendant.

CASE NO. C 12-00944 JST

STIPULATION EXTENDING CASE DEADLINES AND [PROPOSED] ORDER

Judge: Hon. Jon S. Tigar

27 This is a complex case involving claims brought by Plaintiff Retiree Support Group of
28 Contra Costa County ("RSG") on behalf of retirees of Defendant Contra Costa County (the

1 "County") (collectively, the "Parties") claiming a vested right in certain healthcare subsidies as is
 2 more fully stated in Plaintiff's First Amended Complaint.

3 The Parties have engaged in substantial discovery and there still remains a significant
 4 amount of discovery to be completed before this case is ready for trial;

5 RSG and the County have agreed to engage in mediation and to devote their best efforts to
 6 that process, which will be complex and time consuming given the nature of this case;

7 The Parties wish to continue the trial date for 6.5 months (201 days), and to continue case
 8 deadlines accordingly, to allow the Parties sufficient time to explore settlement through mediation;

9 The Court's Scheduling Orders provide the present case deadlines (Dkts. 91, 97 and 112);

10 The Parties, by and through their respective counsel of record, hereby stipulate and agree
 11 that there is good cause to continue all case deadlines as follows pursuant to Federal Rule of Civil
 12 Procedure 16 and Civil Local Rule 16-10 and request the Court approve and so order:

Event	Deadline
Case Management Conference	9/3/15
Expert disclosures	9/14/15
Fact discovery cut-off	10/12/15
Expert rebuttal	10/14/15
Expert discovery cut-off	10/30/15
Deadline to file dispositive motions	11/6/15
Pretrial conference statement due	1/5/16
Pretrial conference	1/12/16 at 2:00 p.m. or such other date available on the Court's schedule 1/22/16 at 2:00 p.m.
Bench trial	2/15/16 at 8:30 a.m. or such other date available on the Court's trial schedule

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2 **IT IS SO STIPULATED.**

3 DATED: March 3, 2015

4 LEWIS, FEINBERG, LEE, RENAKER &
5 JACKSON, P.C.

6 By: _____ /s/
7 ANDREW LAH
8 Attorneys for Plaintiff
9 RETIREE SUPPORT GROUP OF CONTRA
10 COSTA COUNTY

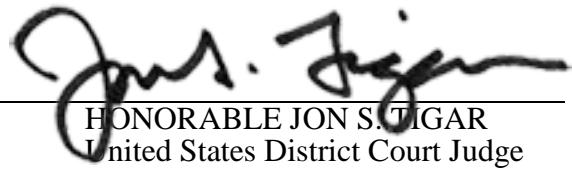
11 DATED: March 3, 2015

12 HANSON BRIDGETT LLP

13 By: _____ /s/
14 RAYMOND F. LYNCH
15 Attorneys for Defendant
16 CONTRA COSTA COUNTY

17 **IT IS SO ORDERED.**

18 Dated: March 5, 2015



19 _____
20 HONORABLE JON S. TIGAR
21 United States District Court Judge

1 SIGNATURES UNDER GENERAL ORDER NO. 45

2 Pursuant to General Order No. 45 of the United States District Court, Northern District of
3 California, I, Raymond F. Lynch—the ECF User whose User ID and Password are used in the
4 filing of this document—hereby attest that the concurrence to the filing of this document has been
5 obtained from each of the other signatories to this document.

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/s/
Raymond F. Lynch